### **Inspection Conclusion Data Sheet (ICDS)**

### FY2006

Inspector: Steven Couto
Inspection Date:
Facility Name/Address: Brockton POTW 303 Oak Hell Way Brockton, MA 02401
Facility Manager/Title and Address (if different from above):  David Norton, Contract Administrator Water & Sever
Facility Contact/Title and Address (if different from above):
1. Media Type: (Check one)
□ CAA-Stationary □ CAA-Mobile Source □ CAA-112r   □ CWA-NPDES □ CWA-Pretreatment POTW □ CWA-Pretreatment IU   □ CWA 311 □ CWA 404   □ EPCRA 313 □ EPCRA N313   □ RCRA-C □ RCRA-I   □ SDWA-UIC □ SDWA-PWSS   □ TSCA-Lead Paint □ TSCA-PCBs □ TSCA-Core □ TSCA-AHERA
2. Did you observe deficiencies (potential violations) during the inspection?
□ Yes □ No
3. If you observed deficiencies, did you communicate them to the facility during the inspection?
☐ Yes ☐ No
4. Deficiencies observed?
Potential violation of a compliance schedule in an enforceable order.
Potential failure to maintain a record or failure to disclose a document.
Potential failure to maintain, inspect or repair equipment including meters, sensors, and recording equipment.
Potential failure to complete or submit a notification, report, certification, or manifest.
Potential failure to obtain a permit, product approval, or certification.

Potential failure to follow a required sampling or monitoring procedure or laboratory procedure.
Potential failure to follow or develop a required management practice or procedure.
Potential failure to identify and manage a regulated waste or pollutant in any media.
Potential failure to report regulated events such as spills, accidents, etc.
Potential incorrect use of a material (e.g., pesticide, waste, product, etc.) or use of improper or unapproved material.
Potential failure to follow a permit condition(s).
5 Did you observe or see the facility take any actions during the inspection to address the deficiencies communicated to the facility?
☐ Yes ☐ No ☐ N/A only if #3 was NO.
1 les 110 WIN/A only if #3 was No.
If YES, check only the action(s) actually observed/seen or write in a short description of the action in the "optional" section. (Check all that apply)
Action(s) taken
Complete(d) a Notification or Report
Correct(ed) Monitoring Deficiencies
Correct(ed) Record Keeping Deficiencies
Implemented New or Improved Management Practices or Procedures
Improved Pollutant Identification (e.g., Labeling, Manifesting, Storage, etc.)
Reduced Pollution (e.g., Use Reduction, Industrial Process Change, Emissions or Discharge Change, etc.)
Request(ed) a Permit Application or Applied for a Permit
Verified Compliance with Previously Issued Enforcement Action - Part or All Conditions
The following common air or water pollutant(s) <b>should only be checked</b> if the "Reduced Pollution" line was checked.
Water: ☐ Ammonia ☐ BOD ☐ COD ☐ TSS ☐ O/G ☐ Total Coliform ☐ D.O. ☐ Metals ☐ Cyanide ☐ Other
Air: □NOx □SO2 □PM □VOC □Metals □HAPs □CO □Other
6. Did you provide general compliance assistance in accordance with the policy on the Role of the EPA Inspector in Providing Compliance Assistance During Inspections?
☐ Yes ☐ No

core is

7. Did you provide site-specific compliance assistance in accordance with the policy on the Role of the EPA Inspector in Providing Compliance Assistance During Inspections?					
☐ Yes ☐ No					
<b>Optional Additional Information:</b> EPA inspectors may wish to provide a narrative description of actions taken by the facility or assistance to help the facility come into compliance. (Narratives may be used in national or regional reports to provide examples of EPA inspection outcomes).					

<b>€</b> FPΔ	United States Environmen Washington, D			
Wate	er Compliance I	nspection Repo	ort .	Property Statement & Statement
	Section A: National	Data System Coding (i.e	., PC\$)	
Transaction Code 1 2 5 3 NPDE		yr/mo/day In  6 0 6 0  17  Remarks	spection Type	Inspector Fac Type  19 20 1
21	ППППП		سس	66
Inspection Work Days Facility Self-Monit	oring Evaluation Rating	BI QA 71 72 72	7374	75       80
Springer Constraint State Constraint	Section	n B: Facility Data		
Name and Location of Facility Inspected (include POTW name and NPDES permit Brock tow Waste	water Treat		Entry Time/Date	Permit Effective Date  Permit Expiration Date
303 Oak Hill Brockton, MA	0		EXIL TIME/Date	Permit Expiration Date
Name(s) of On-Site Representative(s)/Titl		er(s)	Other Facility Data	(e.g., SIC NAICS, and other
Brockton Water	1 Sewer Con	itract Admir	Mult-	Sector Permit
508 580 7	885		6- B	m drains
Section C:  Permit  Records/Reports  Facility Site Review  Effluent/Receiving Waters  Flow Measurement	Areas Evaluated During Self-Monitoring Prog Compliance Schedul Laboratory Operations & Mainte Sludge Handling/Dis	Pretreatment Pollution Pret Storm Water Combined Se	vention ewer Overflow	MS4
(Attach additional sheetest SEV Codes SEV Description	Section D: Sum ts of narrative and check	mary of Findings/Comme dists, including Single E	ents vent Violation code	es, as necessary)
Name(s) and Signature(s) of Inspector(s)	lo	ngency/Office/Phone and Fa	ax Numbers	Date 65 6/5/06
Signature of Management Q A Reviewer	A	gency/Office/Phone and Fa	ax Numbers	Date

#### INSTRUCTIONS

#### Section A: National Data System Coding (i.e., PCS)

Column 1: Transaction Code: Use N, C, or D for New, Change, or Delete. All inspections will be new unless there is an error in the data entered.

Columns 3-11: NPDES Permit No. Enter the facility's NPDES permit number - third character in permit number indicates permit type for U=unpermitted, G=general permit, etc.. (Use the Remarks columns to record the State permit number, if necessary.)

Columns 12-17: Inspection Date. Insert the date entry was made into the facility. Use the year/month/day format (e.g., 04/10/01 = October 01, 2004).

Column 18: Inspection Type\*. Use one of the codes listed below to describe the type of inspection:

A	Performance Audit	U	IU Inspection with Pretreatment Audit	1	Pretreatment Compliance (Oversight)
В	Compliance Biomonitoring	X	Toxics Inspection	100	
C	Compliance Evaluation (non-sampling)	Z	Sludge - Biosolids	@	Follow-up (enforcement)
D	Diagnostic	#	Combined Sewer Overflow-Sampling	1	Storm Water-Construction-Sampling
F	Pretreatment (Follow-up)	\$	Combined Sewer Overflow-Non-Sampling	1	Storm Water-construction-Sampling
G	Pretreatment (Audit)	+	Sanitary Sewer Overflow-Sampling	}	Storm Water-Construction-Non-Sampling
I	Industrial User (IU) Inspection	8	Sanitary Sewer Overflow-Non-Sampling		Storm Water Non Construction Committee
J	Complaints	1	CAFO-Sampling		Storm Water-Non-Construction-Sampling
M	Multimedia	=	CAFO-Non-Sampling	~	Storm Water-Non-Construction-
N	Spill	2	IU Sampling Inspection		Non-Sampling Storm Water-MS4-Sampling
0	Compliance Evaluation (Oversight)	3	IU Non-Sampling Inspection	< ;	Storm Water-MS4-Sampling
P	Pretreatment Compliance Inspection	4	IU Toxics Inspection	-	Storm Water-MS4-Non-Sampling
R	Reconnaissance	5	IU Sampling Inspection with Pretreatment	> 5	Storm Water-MS4-Audit
S	Compliance Sampling	6	IU Non-Sampling Inspection with Pretreatment		
		7	IU Toxics with Pretreatment		

#### Column 19: Inspector Code. Use one of the codes listed below to describe the lead agency in the inspection.

A — State (Contractor) B — EPA (Contractor) E — Corps of Engineers J — Joint EPA/State Inspectors—EPA Lead	O— Other Inspectors, Federal/EPA (Specify in Remarks columns)
E — Corps of Engineers  J — Joint EPA/State Inspectors—EPA Lead	O— Other Inspectors, Federal/EPA (Specify in Remarks columns) P— Other Inspectors, State (Specify in Remarks columns) R— EPA Regional Inspector S— State Inspector
L Local Health Department (State)  N NEIC Inspectors	T — Joint State/EPA Inspectors—State lead

#### Column 20: Facility Type. Use one of the codes below to describe the facility.

- Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
- 2 Industrial. Other than municipal, agricultural, and Federal facilities.
- 3 Agricultural. Facilities classified with 1987 SIC 0111 to 0971.
- 4 Federal. Facilities identified as Federal by the EPA Regional Office.
- 5 Oil & Gas. Facilities classified with 1987 SIC 1311 to 1389.

#### Columns 21-66: Remarks. These columns are reserved for remarks at the discretion of the Region.

Columns 67-69: Inspection Work Days. Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, and remote sensing; and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

Column 70: Facility Evaluation Rating. Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

Column 71: Biomonitoring Information. Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

Column 72: Quality Assurance Data Inspection. Enter Q if the inspection was conducted as followup on quality assurance sample results. Enter N otherwise.

Columns 73-80: These columns are reserved for regionally defined information.

#### Section B: Facility Data

This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, other updates to the record, SIC/NAICS Codes, Latitude/Longitude).

#### Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection.

#### Section D: Summary of Findings/Comments

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.

\*Footnote: In addition to the inspection types listed above under column 18, a state may continue to use the following wet weather and CAFO inspection types until the state is brought into ICIS-NPDES: K: CAFO, V: SSO, Y: CSO, W: Storm Water 9: MS4. States may also use the new wet weather, CAFO and MS4 inspections types shown in column 18 of this form. The EPA regions are required to use the new wet weather, CAFO, and MS4 inspection types for inspections with an inspection date (DTIN) on or after July 1, 2005.



"Roy, Gregory" <RoyG@cdm.com> 09/07/2006 07:35 AM

To Steven Couto/R1/USEPA/US@EPA

cc Norton David <dnorton@ci.brockton.ma.us>, "Hoar, John" <HoarJM@cdm.com>

bcc

Subject Brockton WWTF SWPPP

Hi Steve,

As requested, I have enclosed documents showing that the Brockton SWPPP was created and sent to EPA in Washington. The enclosed PDF has the transmittal letter, Notice of Intent, and table of contents for the SWPPP. I assume this satisfies your request? I hope you are aware that the WWTF operator is following the requirements of this SWPPP.

Regarding SPCC .... My understanding is that there will be no comments from EPA regarding the SPCC requirements and we should proceed with finalizing the document. Please confirm that this is accurate.

Thanks, Greg

<<DOC090706.pdf>>

Gregory A. Roy

#### CDM

One Cambridge Place 50 Hampshire Street Cambridge, MA 02139 phone: (617) 452-6644 fax: (617) 452-8644 cell: (508) 878-7322



DOC090706.pdf



One Cambridge Place, 50 Hampshire Street Cambridge, Massachusetts 02139 tel: 617 452-6000 fax: 617 452-8000

March 7, 2003

Storm Water Notice of Intent EPA East Building, Rm. 7420 1201 Constitution Avenue, NW Washington, DC 20004

Subject:

Brockton Advanced Water Reclamation Facility SWPPP

To Whom It May Concern:

Enclosed is the Notice of Intent for the Brockton Advanced Water Reclamation Facility (and Residuals Landfill) located in Brockton, MA. The Facility intends to be authorized to discharge stormwater under the Multi-Sector General Permit. A Stormwater Pollution Prevention Plan has been prepared for the facility and is available at appropriate locations.

Very truly yours,

Austryn Ciplbert Carolyn Gilbert

Camp Dresser & McKee Inc.

cc: Robert Smith, City of Brockton Craig Young, City of Brockton Michael Curtin, City of Brockton Hubert Spurway, US Filter Greg Roy, CDM Patrick Hughes, CDM **NPDES** Form 3510-6

### United States Environmental Protection Agency Washington, DC 20460

Form Approved OMB No. 2040-0086

Notice of Intent for Storm Water Discharges Associated with INDUSTRIAL ACTIVITY Under the Multi-sector NPDES General Permit

Submission of this completed Notice of Intent (NOI) constitutes notice that the entitiy ed m in nt

# Contents

Section 1 - In	troduction	on	. 1-1
1.1	Purpos	e	1-1
1.2	Descrip	otion of the Facility	1-1
	1.2.1	Wastewater Treatment Facility	1-1
	1.2.2	Ash Disposal Landfill	
1.3	Pollutio	on Prevention Team	
Section 2 - Po	tential S	Storm Water Pollutant Sources	. 2-1
2.1	Draina	ge Mapping	2-1
2.2		ory of Potential Pollutant Sources	
2.3		nd Leaks	
2.4	-	orm Water Discharges	
2.5		Water Monitoring	
2.6		ary of Potential Pollutant Sources	
Section 3 – St	orm Wat	er Controls	. 3-1
3.1	Introdu	action	3-1
3.2		Water BMPs	
	3.2.1	Minimizing Exposure	3-1
	3.2.2	Spill Prevention and Response	
	3.2.3	Management of Runoff	
	3.2.4	Erosion and Sediment Control	
	3.2.5	Good Housekeeping	3-3
	3.2.6	Preventive Maintenance	
	3.2.7	Routine Facility Inspections	
	3.2.8	Quarterly Outfall Monitoring	
	3.2.9	Weekly Landfill Inspections	
	3.3.10	Employee Training	
	3.3.11	Other Controls	
3.3	Summa	ary	
Section 4 - Co	mprehe	nsive Site Compliance Evaluation	. 4-1
Section 5 - Ap	pplicable	e State, Tribal or Local Plans	. 5-1
Section 6 - Do	ocument	ation of Permit Eligibility	. 6-1
6.1		entation of Permit Eligibility Related to Endangered Species	
6.2		entation of Permit Eligibility Related to Historic Places	
Certification b	v Manag	ement	1-2

	00,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
Figures	
Figure 1 Location Plan	1-3
Figure 2 Site Plan	2-2
Worksheets	
Worksheet #1 - Pollution Prevention Team Member Roster	1-5
Worksheet #2 - Potential Pollutant Sources	2-3
Worksheet #3 - Spills and Leaks	2-6
Worksheet #4 - Non-Storm Water Discharge Assessment and Certification	2-7
Appendices	
Appendix A - NOI and General Permit	

Appendix B - Quarterly Visual Monitoring Report

Appendix C - Weekly Landfill Inspection Report

Appendix D - Quarterly Inactive Landfill Inspection Report

Appendix E - Comprehensive Site Compliance Evaluation Report

Appendix F - Agency Correspondence

Form 3510-6

#### United States Environmental Protection Agency Washington, DC 20460

Form Approved OMB No. 2040-0086

# Notice of Intent for Storm Water Discharges Associated with INDUSTRIAL ACTIVITY Under the Multi-sector NPDES General Permit

Submission of this completed Notice of Intent (NOI) constitutes notice that the entitiy in Section B intends to be authorized to discharge pollutants to waters of the United States, from the facility or site identified in Section C, under EPA's Storm Water Multi-sector General Permit (MSGP). Submission of the NOI also constitutes notice that the party identified in Section B of this form has read, understands, and meets the eligibility conditions of Part I of the MSGP; agrees to comply with all applicable terms and conditions of the MSGP; understands that continued authorization under the MSGP is contigent on maintaining eligibility for coverage, and that implementation of the permittee's pollution prevention plan is required two days after a complete NOI is mailed. In order to be granted coverage, all information required on this form must be completed. Please read and make sure you comply with all permit requirements, including the requirement to prepare and implement a storm water pollution prevention plan.

days after a complete NOI is mailed. In order to be granted coverage, all info completed. Please read and make sure you comply with all permit requirements, in implement a storm water pollution prevention plan.	rmation required on this form must be noluding the requirement to prepare and
A.Permit Selection If new, enter generic permit, otherwise enter previous permit: உர்பி	New Permit Number(EPA Use Only)
B. Facility Operator Information	
1. Name: [4]5   F	2. Phone: (510181481017181815)
3. Mailing Address: a. Street or P.O. Box: BEB ICIAIL INTILLY IWAY	
b. City: BRELIGICIAL	d. Zip Code: (1)3 3 0
C. Facility/Site Information	
1. Facility/Site Name: BROCKITGIN LADIVIAINCED IWATER &	ECLAMIATION FACILITY
2. Location Address: a. Street: िं। । । । । । । । । । । । । । । । । । ।	
	Y WHO WITH I I I I I I I I I
d. State: MA e. Zip Code: CPBCU f. Latitude: 出入 DP 出生	g. Longitude: []] IDO RIG
3. If you are filing as a co-permittee, enter storm water general permit number:	
4.a. Permit Applicant: ☐Federal ☐State ☐Tribal ☐ Private ☒ Other public	entity
b. Is the facility located on Indian Country Lands? Yes	
	son Brook and
a. Receiving water(s)? ☑Yes ☐No If yes, name(s) of receiving water(s): ☑If b. A municipal separate storm sewer system (MS4)? ☐Yes ☑ No	ALLISBURY PLIATINI
b. A municipal separate storm sewer system (MS4)? Yes No If yes, name of the MS4 operator:	LIVE
6. The 4-digit Standard Industrial Classification (SIC) codes or the 2-letter Activity	ty Codes that best represent the
principal products produced or services rendered by your facility and major co	
Primary: Secondary (if applicable): 4 1 1 8.Add	ditional Facility/Site Requirements:
Applicable sector(s) of industrial activity, as designated in Part 1.2.1	sed on the instructions provided in
	dendum A of the MSGP, have the
and the second s	ibility criteria for "listed species" and cal habitat been met? ☐ Yes ☐ No
Sector B Sector G Sector L Sector Q Sector V Sector AA b.Bas	sed on the instructions provided in
Sector C Sector H Sector M Sector R Sector W Sector AB Add Sector D Sector I Sector N Sector S Sector X Sector AC	dendum B of the MSGP, have the
Sector E Sector J Sector O Sector T Sector Y Sector AD elig	ibility criteria for protection of historic
	perties been met? Yes No
D. Certification Do you certify under penalty of law that this document and all attachments were	e prepared under your direction or
supervision in accordance with a system designed to assure that qualified personal	onnel properly gather and evaluate the
information submitted? Based on your inquiry of the person or persons who may	anage the system, or those persons
directly responsible for gathering the information, do you certify that the information knowledge and belief, true, accurate, and complete? Do you certify that you are	te aware that there are significant
penalties for submitting false information, including the possibility of fine and ir	mprisonment for knowing violations?
Print Name: LICIBIEIRITI SIMI ITIM	
Signature: Robert Small	Date: তি <u>থি হাতা</u> সাম্ভ
	3



David Norton <dnorton@ci.brockton.ma.u s>

06/08/2006 12:22 PM

To Steven Couto/R1/USEPA/US@EPA

cc James.lauzon@veoliawaterna.com, michael.zeoli@veoliawaterna.com, epeach@aol.com

bcc

Subject Old Sub-Station

Hi Steve - me again, sorry I meant to also give you the old substation oil contents. As you know these will be removed completely during the final stages of the Phase 3 Upgrade at the AWRF.

Substations # 1 - 4 each has 2 transformers in each with each holding 266 gallons of type 1 oil.

**Thanks** 

David A. Norton

City of Brockton

Water & Sewer Contract Administrator

303 Oak Hill Way

Brockton, MA 02301





David Norton <dnorton@ci.brockton.ma.u s>

06/08/2006 11:52 AM

To Steven Couto/R1/USEPA/US@EPA

cc James.lauzon@veoliawaterna.com, michael.zeoli@veoliawaterna.com, Joe Shepherd <Joseph.Shepherd@state.ma.us>

bcc

Subject New Sub-Stations Brockton AWRF

Hi Steve,

I have CDM working on the other issues but below is what I have gotten from the Phase 1 Electrical Contractor relative to oil reservoirs in the new Electrical Sub-Stations.

Substations # 1 & 3 each has 2 transformers with each holding 360 gallons of type 2 oil

Substations # 2 & 4 each has 2 transformers with each holding 348 gallons of type 2 oil

David A. Norton

City of Brockton

Water & Sewer Contract Administrator

303 Oak Hill Way

Brockton, MA 02301



## USEPA REGION I FACILITY INFORMATION

Inspector's Name: Steven Conto FRP REGION	AL #:N/A						
Inspection Team Members:							
Type of Inspection: SPCC[X] FRP[] SPCC and FRP[] Follow-up Inspection[] Plan Review[]							
Name of Facility: Brockton Wastewater Treatment Plant							
Facility Address: 303 Oak Hill Way							
City: Brockton County:	State: MA	Zip: 07401					
Latitude: Longitude:							
Nearest "Waters of the U.S.": Salisburg Place	River						
Facility Contact: David Norton RESPONSE Contract Administrator Title: Water & Sevole							
Facility Contact: 2. James Lauzon Title: Project Mgr.							
Telephone Number: 508 580 7885							
Name of Owner/Operator: City of Brockton,	MA						
Corporate Address: City Hall 45 School	stret						
City: Brockton	State: MA	Zip: 0230 /					
Corporate Contact: Michael Thoreson Title: Commission							
Telephone Numbers: 1. 2. (508) 580 - 7135							
Synopsis of business operations: POTW							
Facility is: [ ] Unattended [ ] Attended [ ] 8 hrs [ ] 24 hrs] [ ]	Periodically [ ]	Other (Specify)					
How many employees at this Facility? 3							
If unmanned, number of employees needed to operate the Facility?							

### FACILITY STORAGE INVENTORY

ITEM	TANK ID NUMBER	SHELL CAPACITY	PRODUCT	ITEM	TANK ID NUMBER	SHELL CAPACITY	PRODUCT
1.	see aff draft	ached slue. SPCC by	t from CDM	2.	55 gal	drum hyd S.F. pum	raulic building
3	The state of the Carlotter of the State of t	SPCC doe		4.		-drums of	4
5.		ations or		6.	oil in	Building	06
7.				8.	3-55 g	el Mobil	Oil draws
9.	Sollower	the mope	tainers	10.		3'x3'x1' 2 shead or	67 gal
11.	were for	und that the drast	WETE SPCC	12.		500 gal die	
13.	Tank 1's	13' x 3' 7 47	gal mi	14. ONSE	pri clas	ifices & ac	ration
15.	Lheine	rator bui	1 ding	16.			
17.	in hazo	l drum-u	aste oil te area	18.	Electr	cal Substa	tions
19.	1-55ga	Lduin No	. 40 oct	20.	4 old s.	tations - 8 t	or 2128gal
21.	new de	livery		22.	will be	replaced k	y 4 new
23.	4-55 que Pallete	l - waste s-outside	oil on	24.	Type 2	oil	2832 gal
25.		mounted g ster - 275		26.	by =	.008.	

approximately 1624 more found during inspection
approximately 1624 more found during inspection
Total Bulk Above Ground Storage: 2124 gallons
Total Bulk Below Ground Storage: /3 800 gallons
Total Oil-Filled Equipment Storage  2832 gallons replace 4 old substations  14,000 with 2128 gallons
Total Oil-Filled Equipment Storage 2832 gallons replace 4 old substations
14,000 with 2,28 gallous
2 news servers tong 7,000 gal AST
Total Facility Oil Storage Capacity: 32, 756 gallons each
Total Facility Oil Storage Capacity: 32,756 gallons
The POTW is currently under construction for a major
The POTW is currently under construction for a major upgrade so some of the existing tankage will be
removed and some new tankage will be added.
Revised: Feb 28, 2006 See attached table from SPCC Plan
Page 2 of 5

Table 2-1
Brockton WWTF Oil Storage Summary

Tank No.	Location	Type of Tank Container	FOil Storage Summary Function	Size/Contents	Comments
1	Influent Pumping Station	Underground double walled fiberglass tank	Emergency Power Generator	2,000 gal – Diesel Fuel	Proposed for Removal
2	Screen Building	Underground double walled fiberglass tank	Boiler/Heat	550 gal – No. 2 Fuel Oil	
3	RAS Pumping Station	Underground double walled fiberglass tank	Boiler/Heat	550 gal - No. 2 Fuel Oil	
4	Secondary Effluent Lift Station	Aboveground single walled steel tank	Emergency Power Generator	500 gal – Diesel Fuel Oil	Proposed for Removal
5	Disinfection Building	Underground double walled fiberglass tank	Emergency Power Generator	550 gal – Diesel Fuel Oil	Proposed for Removal
5	Near Sludge Storage Tank SST-1	Underground double walled fiberglass tank	Boiler/Heat	2,000 gal - No. 2 Fuel Oil	Proposed for Removal
7	Incinerator Building In Basement Vault	Underground single walled steel tank	Emergency Power Generator	550 gal– Diesel Fuel	Proposed for Removal
3	Incinerator Building In Basement Vault	Underground single walled steel tank	Incinerator	7,600 gal – No.2 Fuel Oil	Proposed for Fuel Reuse and Tank Removal
)	Near Digester Gas Storage Tank	Aboveground, double walled steel tank	Emergency Power Generator	7,000 gal – Diesel Fuel	New Installation
0	Near Digester Gas Storage Tank	Aboveground, double walled steel tank	Emergency Power Generator	7,000 gal – Diesel Fuel	New Installation



RESPO		
RESPO		
RESPO	NIGIT.	
RESPO		
I RESPO	NIGHT.	
RESPO	NIGIT.	
RESPO	NIGIT.	
RESPO	NIGE.	
RESPO	2)	
RESPO	MIGE	
RESPO	The Cart	
	MOE	

Memorandum of Unde	rstanding (check all applic	able descriptions):	
[ ] Non-Transportation	Related	[ ] Transportation Rela	ated
[X] EPA	[] MMS	[ ] USCG	[ ] RSPA/OPS
[X] Onshore [] Off shore [] Drilling [] Production [] Refining [] In-plant processing [] Waste Treatment [] Storage [] Commercial [] Agriculture [] Industrial [] Public [] Load/Unloading [] Facility Piping	[ ] Drilling [ ] Production [ ] Storage	[ ] Vessel/shore transfer [ ] Oily ballast tanks [ ] Tank washings from vessels	[ ] Inline/ Breakout Tanks: (for continuous pipeline operation)
SPCC Part 112.1(b)	[ ] Producing [ ] Gathering [ Storing	[ ] Processing [ ] Refining [ ] Transferring	[ ] Distributing  [ ○ Consuming oil/oil products
Facility Type:  [ ] Bulk storage [ ] Gas Station     /Convenience [ ] Petroleum     Distributor	RESPO	DNSE [ ] Federal(Military) [ ] Air Taxi(Airline) [ ] Aircraft owner [ ] Auto Dealership [ ] Contractor [ ] Farm	[ ] Railroad [ ] Residential [ ] Trucking /Transport [ ] Trustee/Native American [ ] Other:

\_\_\_\_The Oil Pollution Prevention Regulations at 40 CFR Part 112 do not appear to be applicable to this facility.

The Oil Pollution Prevention Regulations at 40 CFR Part 112 are applicable to this facility.

If your facility has been found to be in noncompliance with the provisions of 40 CFR Part 112, you are hereby required to submit as soon as possible, a statement detailing the actions taken by the facility to correct the deficiencies specified in the attached. If, in order to correct the deficiencies, your facility was required to prepare an SPCC plan, or amend an existing SPCC plan, you are also required to submit a copy of such new or revised plan. If completion of the plan is not feasible within thirty (30) days, you are hereby required to submit a detailed schedule of when the SPCC plan or revision thereof will be completed. The schedule should include the name and address of the registered professional engineer certifying the plan. If the plan calls for the construction of secondary containment at the facility, the schedule should include construction milestone dates. This information should be sent to the EPA inspector listed below at the following address:

Office of Environmental Stewardship
Mail Code: SEW
U.S. Environmental Protection Agency
New England Region
One Congress Street
Boston, MA 02114 - 2023

Please be advised that the facility's noncompliance with the Oil Pollution Prevention regulations at 40 CFR Part 112 constitutes a violation of the Clean Water Act for which both injunctive relief and penalties can be sought. Under the Clean Water Act, the facility is subject to penalties up to \$27,500 per day for violations occurring from January 31, 1997, through March 15, 2004, and up to \$32,500 per day for violations occurring after March 15, 2004.

EPA reserves its right to take an enforcement action pursuant to the Clean Water Act, including the right to seek penalties, for any violations detected at the above-referenced inspection. Although preparing and/or revising an SPCC plan and submitting it to EPA does not preclude EPA from seeking penalties for violations of the Clean Water Act, your prompt response towards coming into full compliance with the Oil Pollution Prevention regulations will be taken into account in determining EPA's enforcement response.

EPA Inspector Signature:	Stiven	Conto	Date:
1 0		, Martinesas	

outo Title: Engerieur EPA Inspector Printed Name: Steven

I acknowledge having received arr SPCG inspection by EPA on this date.

Company Contact Signature:

Company Contact Printed Name: MAUID

Title: WATER & SCWER
CONTRACT ADMINISTRATER

City of BrockTON

# **Brockton, MA Wastewater Treatment Facility**

### **On Site Fuel and Diesel Oil Tanks**

Building	Installation	Fuel/Oil	Volume	Method of		Above or
Location	<u>Date</u>	<u>Type</u>	Capacity	Construction	<u>Use</u>	Underground
#1	1983	Diesel	2000	Double Wall Fiberglass	Generator	Underground
#1	1983	Fuel Oil	1000	Double Wall Fiberglass	Oil Burner (Heating)	Underground
# 4	1983	Fuel Oil	550	Double Wall Fiberglass	Oil Burner (Heating)	Underground
#6	1990	Diesel	200	Steel	Generator (at	Aboveground tached to Genset)
#7	1983	Diesel	550	Double Wall Fiberglass	Generator	Underground
#9	1983	Fuel Oil	2000	Double Wall Fiberglass	Heat Exchanger (Heating)	Underground
# 11	1983	Fuel Oil	7600	Steel	Incinerator	Underground Vault
# 11	1983	Diesel	550	Steel	Generator	Underground Vault
Portable	NA	Diesel	275	Steel	Generator (at	Aboveground tached to Genset)

### **Total Storage Capacities**

Underground Volume 14,250

Aboveground 475

Note: The Wastewater Facility electrical supply system consists of 8 transformers each with a 266 gal. capacity. Oil utilized in these units is a non-petroleum base mineral oil so is not currently figured into the storage capacities.

## USEPA REGION I FACILITY INFORMATION

Inspector's Name: Steven C	FRP REGION	AL #:N/A					
Inspection Team Members:							
Type of Inspection: SPCC[X] FRP[] SPCC and FRP[] Follow-up Inspection[] Plan Review []							
Name of Facility: Brockton Wastewater Treatment Plant							
Facility Address: 303 Oak Hill Way							
City: Brockton	County:		State: MA	Zip: 02401			
Latitude: Longitude:							
Nearest "Waters of the U.S.": Salusburg Place River							
Facility Contact: . David	Contract Title: Water	Administrator r & Sever					
Facility Contact: 2. James	Title: Proje	ct Mqr.					
Telephone Number: 508 580 7885							
Name of Owner/Operator: City of Brockton, MA							
Corporate Address: City H	fall 45	3chool	stret				
City: Brockton			State: MA	Zip: 0230 /			
Corporate Contact: Michael Thoreson			Title: Comm	issioner DAW			
Telephone Numbers: 1. 2. (508) 580 - 7135							
Synopsis of business operations: POTW							
Facility is: [ ] Unattended [ ] A	ttended []8 hrs [v	24 hrs] [ ] ]	Periodically [ ]	Other (Specify)			
How many employees at this Facil	lity? 31						
If unmanned, number of employees	If unmanned, number of employees needed to operate the Facility?						

## FACILITY STORAGE INVENTORY

ITEM	TANK ID NUMBER	SHELL CAPACITY	PRODUCT	ITEM	TANK ID NUMBER	SHELL CAPACITY	PRODUCT
1.		ached slue. SPCC by		2.	55 gal	drum hyd S.F. pum	raulic building
3	draft	SPCC doe	s upt thic	4.			,
5.	Subst the F	ations of	oned by	6.		- drums of Building	
7.		*30		8.	3-55 g	el Mobil side	Oil drives
9.	Sollowin	the mope	tainers	10.		3'43'41' = shead or	A THE RESERVE AND A PROPERTY OF A STREET AND ASSOCIATION OF A STREET
11.	were for	und that the drast	SPCC 1	12.		soo gal die	
13.	Tank 1'x	3' x 3' 72 67	gal wi	14. ONSE	pri clas	ifiers & ac	ration
15.		m lower bui		16.			
17.	in haza	l drum - u vdous was	aste oil te area	18.		cal Substa	
19.	1-55 gal	- drum No	. 40 oct	20.	4 old s.	tations -8t each Type 1	or 212890
21.		livery		22.	well be	replaced k	4 4 new
23.	4-55 que Pallets	l - waste - outside	oclon	24.		oil	
	trailer.	mounted gester - 275	merator	26.	by =	.008.	

Total Bulk Above Ground Storage: 2124 more found during inspection
approximately 1624 more found during inspection
Total Bulk Above Ground Storage: 2124 gallons
Total Bulk Below Ground Storage: /3 800 gallons
Total Oil-Filled Equipment Storage  Total Facility Oil Storage Capacity:  Total Facility Oil Storage Capacity:
14,000 with 2128 gallous
2 new generators 7,000 gal HS
Total Facility Oil Storage Capacity: 32,756 gallons each
The POTW is currently under construction for a major
The POTW is currently under construction for a major upgrade so some of the existing tankage will be removed and some new tankage will be added.  Revised: Feb 28, 2006 See attached table from SPCC Plan
removed and some new tankage will be added.
Revised: Feb 28, 2006 See attached table from SPCC Plan
Page 2 of 5

Table 2-1
Brockton WWTF Oil Storage Summary

Tank No.	Location	Type of Tank Container	F Oil Storage Summar  Function	Size/Contents	Comments
1	Influent Pumping Station	Underground double walled fiberglass tank	Emergency Power Generator	2,000 gal – Diesel Fuel	Proposed for Removal
2	Screen Building	Underground double walled fiberglass tank	Boiler/Heat	550 gal - No. 2 Fuel Oil	
3	RAS Pumping Station	Underground double walled fiberglass tank	Boiler/Heat	550 gal – No. 2 Fuel Oil	
4	Secondary Effluent Lift Station	Aboveground single walled steel tank	Emergency Power Generator	500 gal – Diesel Fuel Oil	Proposed for Removal
5	Disinfection Building	Underground double walled fiberglass tank	Emergency Power Generator	550 gal – Diesel Fuel Oil	Proposed for Removal
6	Near Sludge Storage Tank SST-1	Underground double walled fiberglass tank	Boiler/Heat	2,000 gal – No. 2 Fuel Oil	Proposed for Removal
7	Incinerator Building In Basement Vault	Underground single walled steel tank	Emergency Power Generator	550 gal- Diesel Fuel	Proposed for Removal
3	Incinerator Building In Basement Vault	Underground single walled steel tank	Incinerator	7,600 gal – No.2 Fuel Oil	Proposed for Fuel Reuse and Tank Removal
9	Near Digester Gas Storage Tank	Aboveground, double walled steel tank	Emergency Power Generator	7,000 gal – Diesel Fuel	New Installation
.0	Near Digester Gas Storage Tank	Aboveground, double walled steel tank	Emergency Power Generator	7,000 gal – Diesel Fuel	New Installation

Facility Diagram:				
		RESPONSE		
	CA CONTRACTOR		to the "Waters of the United	States".
•		4		

Menorandum of Unde	rstanding (check all appl	icable descriptions):	
[ ] Non-Transportation	Related	[ ] Transportation Rela	ated
[X] EPA	[] MMS	[ ] USCG	[ ] RSPA/OPS
[X] Onshore [] Off shore [] Drilling [] Production [] Refining [] In-plant processing [] Waste Treatment [] Storage [] Commercial [] Agriculture [] Industrial [] Public [] Load/Unloading [] Facility Piping	[ ] Drilling [ ] Production [ ] Storage	[ ] Vessel/shore transfer [ ] Oily ballast tanks [ ] Tank washings from vessels	[ ] Inline/ Breakout Tanks: (for continuous pipeline operation)
SPCC Part 112.1(b)	[ ] Producing [ ] Gathering [ Storing	[ ] Processing [ ] Refining [ ] Transferring	[ ] Distributing  Consuming oil/oil  products
Facility Type: [ ] Bulk storage [ ] Gas Station     /Convenience [ ] Petroleum     Distributor	RESI [ ] Industrial [ ] Commercial [ ] Utilities    Local Gov. [ ] State Gov. [ ] Federal   (Non-Military)	PONSE [ ] Federal(Military) [ ] Air Taxi(Airline) [ ] Aircraft owner [ ] Auto Dealership [ ] Contractor [ ] Farm	[ ] Railroad [ ] Residential [ ] Trucking /Transport [ ] Trustee/Native American [ ] Other:

\_\_\_\_The Oil Pollution Prevention Regulations at 40 CFR Part 112 do not appear to be applicable to this facility.

The Oil Pollution Prevention Regulations at 40 CFR Part 112 are applicable to this facility.

If your facility has been found to be in noncompliance with the provisions of 40 CFR Part 112, you are hereby required to submit as soon as possible, a statement detailing the actions taken by the facility to correct the deficiencies specified in the attached. If, in order to correct the deficiencies, your facility was required to prepare an SPCC plan, or amend an existing SPCC plan, you are also required to submit a copy of such new or revised plan. If completion of the plan is not feasible within thirty (30) days, you are hereby required to submit a detailed schedule of when the SPCC plan or revision thereof will be completed. The schedule should include the name and address of the registered professional engineer certifying the plan. If the plan calls for the construction of secondary containment at the facility, the schedule should include construction milestone dates. This information should be sent to the EPA inspector listed below at the following address:

Office of Environmental Stewardship
Mail Code: SEW
U.S. Environmental Protection Agency
New England Region
One Congress Street
Boston, MA 02114 - 2023

Please be advised that the facility's noncompliance with the Oil Pollution Prevention regulations at 40 CFR Part 112 constitutes a violation of the Clean Water Act for which both injunctive relief and penalties can be sought. Under the Clean Water Act, the facility is subject to penalties up to \$27,500 per day for violations occurring from January 31, 1997, through March 15, 2004, and up to \$32,500 per day for violations occurring after March 15, 2004.

EPA reserves its right to take an enforcement action pursuant to the Clean Water Act, including the right to seek penalties, for any violations detected at the above-referenced inspection. Although preparing and/or revising an SPCC plan and submitting it to EPA does not preclude EPA from seeking penalties for violations of the Clean Water Act, your prompt response towards coming into full compliance with the Oil Pollution Prevention regulations will be taken into account in determining EPA's enforcement response.

EPA Inspector Signature: Sures Could Date: 4/1/06

EPA Inspector Printed Name: Steven Coulo Title: Engener

I acknowledge having received ar SPCG inspection by EPA on this date.

Company Contact Signature:

Company Contact Printed Name: MONTON A. NONTON

Title: WATER & Scher CONTRACT ADMINISTRAGE

CITY OF BROCKTON

## USEPA REGION I FACILITY INFORMATION

Inspector's Name: Steven Conto	Couto FRP REGIONAL #:N/A				
Inspection Team Members: 3a we					
Type of Inspection: SPCC[X] FRP[] SPCC and FRP[]	Follow-up Inspection [ ] Plan Review [ ]				
Name of Facility: Brockton Wastewa	ter Treatment Plant				
Facility Address: 303 Oak Hill Wa	y				
City: Brockton County:	State: MA Zip: 02401				
Latitude:	Longitude:				
Nearest "Waters of the U.S.": Salisburg Plain River					
Facility Contact: David Norton	Contract Administrator Title: Water & Sever				
Facility Contact: 2. James Lauzon	Title: Project Mqr.				
Telephone Number: 508 580 7885					
Name of Owner/Operator: City of Brockton, MA					
Corporate Address: City Hall 45	School Stret				
City: Brockton	State: MA Zip: 0230/				
Corporate Contact: Michael Thoreso	n Title: Commissioner DPW				
Telephone Numbers: 1. 2. (508) 580 - 7135					
Synopsis of business operations: POTW					
Facility is: [ ] Unattended [ ] Attended [ ] 8 hrs [ ] 24 hrs] [ ] Periodically [ ] Other (Specify)					
How many employees at this Facility? 31					
If unmanned, number of employees needed to operate the Facility?					

## FACILITY STORAGE INVENTORY

ITEM	TANK ID NUMBER	SHELL CAPACITY	PRODUCT	ITEM	TANK ID NUMBER	SHELL CAPACITY	PRODUCT
1.	see aff draft	ached slue- SPCC by	t from CDM	2.	55 gal	drum hyd S.F. pum	raulic
3	draft	SPCC doe	s not the	4.		- drums of	
5.	subst the F	ations of	oned by	6.	och in	Building	06
7.	***E-1			8.	3-55 g	el Mobil side	Oil draws
9.	Sollowin	the mope	tainers	10.	THE RESERVE OF THE PARTY OF THE	3'43'41' a shead or	
11.	were for	und that the drast	SPCC /	12.		soo gal dre	
13.	Tank 1'x	3' x 3' 72 47	gal wil	14. ONSE	pri clas bascus	ifices & ac	ration
15.	Lheine	m lower bui	Iding	16.			
17.	1-55ga	l drum-u	aste oil te area	18.	Electri	cal Bubsta	tions
19.	1-55 gal	wers - or	. 40 oct	20.	4 old 3.	tations -8t each Type 1	or 212000
21.	new de	livery	3000	22.	will be	replaced b	y 4 new
23.	4-55 gal	l - waste - outside	oct on	24.		oil	
25.	trailer.	mounted greater - 275	merator	26.	by a	.008,	

Total Bulk Above Ground Storage: 2124 gallons
Total Bulk Above Ground Storage: 2124 gallons
Total Bulk Below Ground Storage: 13 800 gallons
M4 new electrical substations - we
Total Oil-Filled Equipment Storage 2832 gallons replace 401d substations
Total Oil-Filled Equipment Storage 2832 gallons replace 4 old substations — with 2128 gallons
Tana and Ast
Total Facility Oil Storage Capacity: 32,756 gallons each
Total Facility Oil Storage Capacity: 32,756 gallons each
The POTW is currently under construction for a major upgrade so some of the existing tankage will be removed and some new tankage will be added.  Revised: Feb 28, 2006 See attached table from SPCC Plan
upgrade so some of the existing tankage will be
removed and some new tankare will be added.
Revised: Feb 28, 2006 Ser attached table from SPCC Plan
Page 2 of 5
INDEAN TRANSPORTED AND AND INTERNAL PROPERTY OF THE PROPERTY IN THE PROPERTY OF THE PROPERTY IN THE PROPERTY

Table 2-1 Brockton WWTF Oil Storage Summary

Tank No.	Location	Type of Tank Container	FOil Storage Summary Function	Size/Contents	Comments
1	Influent Pumping Station	Underground double walled fiberglass tank	Emergency Power Generator	2,000 gal – Diesel Fuel	Proposed for Removal
2	Screen Building	Underground double walled fiberglass tank	Boiler/Heat	550 gal - No. 2 Fuel Oil	
3	RAS Pumping Station	Underground double walled fiberglass tank	Boiler/Heat	550 gal – No. 2 Fuel Oil	
4	Secondary Effluent Lift Station	Aboveground single walled steel tank	Emergency Power Generator	500 gal – Diesel Fuel Oil	Proposed for Removal
5	Disinfection Building	Underground double walled fiberglass tank	Emergency Power Generator	550 gal – Diesel Fuel Oil	Proposed for Removal
6	Near Sludge Storage Tank SST-1	Underground double walled fiberglass tank	Boiler/Heat	2,000 gal – No. 2 Fuel Oil	Proposed for Removal
7	Incinerator Building In Basement Vault	Underground single walled steel tank	Emergency Power Generator	550 gal- Diesel Fuel	Proposed for Removal
8	Incinerator Building In Basement Vault	Underground single walled steel tank	Incinerator	7,600 gal – No.2 Fuel Oil	Proposed for Fuel Reuse and Tank Removal
9	Near Digester Gas Storage Tank	Aboveground, double walled steel tank	Emergency Power Generator	7,000 gal – Diesel Fuel	New Installation
10	Near Digester Gas Storage Tank	Aboveground, double walled steel tank	Emergency Power Generator	7,000 gal – Diesel Fuel	New Installation

		RESPONSE			
escription of the p	athways that an oil	spill might follow, lea	ding to the "Water	s of the United Sta	ates"
		ue Salisbu			

Memorandum of Unde	rstanding (check all appli	cable descriptions):			
[ ] Non-Transportation	Related	[ ] Transportation Related			
[X] EPA	[] MMS	[ ] USCG	[ ] RSPA/OPS		
[X] Onshore [] Off shore [] Drilling [] Production [] Refining [] In-plant processing [] Waste Treatment [] Storage [] Commercial [] Agriculture [] Industrial [] Public [] Load/Unloading [] Facility Piping	[ ] Drilling [ ] Production [ ] Storage	[ ] Vessel/shore transfer [ ] Oily ballast tanks [ ] Tank washings from vessels	[ ] Inline/ Breakout Tanks: (for continuous pipeline operation)		
SPCC Part 112.1(b)	[ ] Producing [ ] Gathering [ Storing	[ ] Processing [ ] Refining [ ] Transferring	[ ] Distributing [ Consuming oil/oil products		
Facility Type: [ ] Bulk storage [ ] Gas Station     /Convenience [ ] Petroleum     Distributor	RESP [] Industrial [] Commercial [] Utilities M Local Gov. [] State Gov. [] Federal (Non-Military)	ONSE [ ] Federal(Military) [ ] Air Taxi(Airline) [ ] Aircraft owner [ ] Auto Dealership [ ] Contractor [ ] Farm	[ ] Railroad [ ] Residential [ ] Trucking /Transport [ ] Trustee/Native American [ ] Other:		

\_\_\_\_The Oil Pollution Prevention Regulations at 40 CFR Part 112 do not appear to be applicable to this facility.

The Oil Pollution Prevention Regulations at 40 CFR Part 112 are applicable to this facility.

If your facility has been found to be in noncompliance with the provisions of 40 CFR Part 112, you are hereby required to submit as soon as possible, a statement detailing the actions taken by the facility to correct the deficiencies specified in the attached. If, in order to correct the deficiencies, your facility was required to prepare an SPCC plan, or amend an existing SPCC plan, you are also required to submit a copy of such new or revised plan. If completion of the plan is not feasible within thirty (30) days, you are hereby required to submit a detailed schedule of when the SPCC plan or revision thereof will be completed. The schedule should include the name and address of the registered professional engineer certifying the plan. If the plan calls for the construction of secondary containment at the facility, the schedule should include construction milestone dates. This information should be sent to the EPA inspector listed below at the following address:

Office of Environmental Stewardship
Mail Code: SEW
U.S. Environmental Protection Agency
New England Region
One Congress Street
Boston, MA 02114 - 2023

Please be advised that the facility's noncompliance with the Oil Pollution Prevention regulations at 40 CFR Part 112 constitutes a violation of the Clean Water Act for which both injunctive relief and penalties can be sought. Under the Clean Water Act, the facility is subject to penalties up to \$27,500 per day for violations occurring from January 31, 1997, through March 15, 2004, and up to \$32,500 per day for violations occurring after March 15, 2004.

EPA reserves its right to take an enforcement action pursuant to the Clean Water Act, including the right to seek penalties, for any violations detected at the above-referenced inspection. Although preparing and/or revising an SPCC plan and submitting it to EPA does not preclude EPA from seeking penalties for violations of the Clean Water Act, your prompt response towards coming into full compliance with the Oil Pollution Prevention regulations will be taken into account in determining EPA's enforcement response.

EPA Inspector Signature: \_

EPA Inspector Printed Name: Stevens Coulo Title: Engeneer

I acknowledge having received ar SPCG inspection by EPA on this date.

Company Contact Signature:

Company Contact Printed Name: VAUID

Title: WATER & Sewer CONTRACT ADMINISTRAGE

City OF BROCKTON